

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB (LJC)

**DECLARATION OF LAURA VARTAIN
HORN IN SUPPORT OF UBER'S
STATEMENT IN RESPONSE TO
PLAINTIFF'S ADMINISTRATIVE MOTION
TO CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE
SEALED [PLAINTIFF'S OPENING
MOTIONS IN LIMINE]**

This Document Relates to:

Jaylynn Dean v. Uber Techs., Inc.,
N.D. Cal. Case No. 3:23-cv-06708-CRB
D. Ariz. Case No. 2:25-cv-04276-CRB

Judge: Hon. Charles R. Breyer
Courtroom: 6 – 17th Floor

UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA
PHOENIX DIVISION

JAYLYNN DEAN,

Plaintiff,

v.

UBER TECHNOLOGIES, INC., et al.,

Defendants.

CASE NO. 25-cv-4276-PHX-CRB

Judge: Hon. Charles R. Breyer

Courtroom: 501

1 I, Laura Vartain Horn, declare as follows:

2 1. I am an attorney at Kirkland & Ellis LLP, counsel of record for Defendants Uber
3 Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, “Uber”). I offer this Declaration in
4 the above-captioned matter in support of Uber’s Statement in Response to Plaintiff’s Administrative
5 Motion to Consider Whether Another Party’s Material Should Be Sealed [Plaintiff’s Opening Motions in
6 Limine].

7 2. Plaintiff takes no position as to Uber’s proposed redactions.

8 3. Attached as Exhibit A is a true and correct copy of Plaintiff’s Motions in Limine with
9 Uber’s proposed redactions.¹

10 4. Attached as Exhibit B is a true and correct copy of Exhibit 7 to Plaintiff’s Motions in
11 Limine with Uber’s proposed redactions.

12 5. Attached as Exhibit C is a true and correct copy of Exhibit 8 to Plaintiff’s Motions in
13 Limine with Uber’s proposed redactions.

14 6. Attached as Exhibit D is a true and correct copy of Exhibit 9 to Plaintiff’s Motions in
15 Limine with Uber’s proposed redactions.

16 7. Attached as Exhibit E is a true and correct copy of Exhibit 29 to Plaintiff’s Motions in
17 Limine with Uber’s proposed redactions.

18 8. Attached as Exhibit F is a true and correct copy of Exhibit 30 to Plaintiff’s Motions in
19 Limine with Uber’s proposed redactions.

20 9. Attached as Exhibit G is a true and correct copy of Exhibit 31 to Plaintiff’s Motions in
21 Limine with Uber’s proposed redactions.

22 10. Attached as Exhibit H is a true and correct copy of Exhibit 32 to Plaintiff’s Motions in
23 Limine with Uber’s proposed redactions.

24 11. Attached as Exhibit I is a true and correct copy of Exhibit 38 to Plaintiff’s Motions in
25 Limine with Uber’s proposed redactions.

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28 ¹ Pages 3-6 of the Motion include the redactions sought by Plaintiff, reproduced by Uber here.

1 I declare under penalty of perjury under the laws of the United States of America that the foregoing
2 is true and correct.

3 Dated: January 6, 2026

4 /s/ Laura Vartain Horn
5 Laura Vartain Horn
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